

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JUANA SIERRA,

Plaintiff,

-against-

**NOTICE OF MOTION TO
DISMISS THE COMPLAINT**

THE CITY OF NEW YORK; NEW YORK CITY
DEPARTMENT OF BUILDINGS; PATRICIA J.
LANCASTER, in her capacity as COMMISSIONER OF
THE NEW YORK CITY DEPARTMENT OF
BUILDINGS; NEW YORK CITY DEPARTMENT OF
HOUSING PRESERVATION AND DEVELOPMENT;
SHAUN DONOVAN, in his capacity as
COMMISSIONER OF NEW YORK CITY
DEPARTMENT OF HOUSING PRESERVATION AND
DEVELOPMENT; and EMAD IBRAHEM,

No. 07 CV 6769 (JSR)

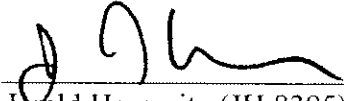
Defendants.

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PLEASE TAKE NOTICE that defendants the City of New York (“the City”), the New York City Department of Buildings (“DOB”), Patricia J. Lancaster, in her capacity as Commissioner of DOB, the New York City Department of Housing Preservation and Development (“HPD”), and Shaun Donovan, in his capacity as Commissioner of HPD, by its undersigned counsel, will move this Court before the Honorable Jed S. Rakoff, at the United States Courthouse located at 500 Pearl Street, New York, New York, on a date and at a time to be designated by the Court, for an order pursuant to Federal Rules of Civil Procedure, Rule 12(b), for the dismissal of all claims in the complaint.

Dated: New York, New York
December 6, 2007

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By: 
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Attorneys for Defendant Emad Ibrahim

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NOTICE OF MOTION

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